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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF KYLE SMITH
IN SUPPORT OF DEFENDANTS' PORTION
OF THE JOINT LETTER REGARDING
WILLIAMS HART PLAINTIFFS'
COMPLIANCE WITH 11/18 PFS ORDER**

This Document Relates to:

*WHB 1017 v. Uber Technologies, Inc., et
al.*, No. 3:24-cv-04806

*WHB 1293 v. Uber Technologies, Inc., et
al.*, No. 3:24-cv-04817

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

1 *WHB 1027 v. Uber Technologies, Inc., et*
2 *al., No. 3:24-cv-04820*

3 *WHB 928 v. Uber Technologies, Inc., et*
4 *al., No. 3:24-cv-04825*

5 *WHB 511 v. Uber Technologies, Inc., et*
6 *al., No. 3:24-cv-04842*

7 *WHB 860 v. Uber Technologies, Inc., et*
8 *al., No. 3:24-cv-04845*

9 *WHB 1123 v. Uber Technologies, Inc., et*
10 *al., No. 3:24-cv-04850*

11 *WHB 1023 v. Uber Technologies, Inc., et*
12 *al., No. 3:24-cv-04877*

13 *WHB 1497 v. Uber Technologies, Inc., et*
14 *al., No. 3:24-cv-04891*

15 *WHB 333 v. Uber Technologies, Inc., et*
16 *al., No. 3:24-cv-04905*

17 *WHB 1658 v. Uber Technologies, Inc., et*
18 *al., No. 3:24-cv-04907*

19 *WHB 203 v. Uber Technologies, Inc., et*
20 *al., No. 3:24-cv-04912*

21 *WHB 1873 v. Uber Technologies, Inc., et*
22 *al., No. 3:24-cv-04933*

23 *WHB 1619 v. Uber Technologies, Inc., et*
24 *al., No. 3:24-cv-04961*

25 *WHB 689 v. Uber Technologies, Inc., et*
26 *al., No. 3:24-cv-04965*

27 *WHB 175 v. Uber Technologies, Inc., et*
28 *al., No. 3:24-cv-04982*

WHB 1845 v. Uber Technologies, Inc., et
al., No. 3:24-cv-05015

WHB 676 v. Uber Technologies, Inc., et
al., No. 3:24-cv-05024

1 *WHB 1900 v. Uber Technologies, Inc., et*
2 *al.*, No. 3:24-cv-05031

3 *WHB 1941 v. Uber Technologies, Inc., et*
4 *al.*, No. 3:24-cv-05032

5 *WHB 1431 v. Uber Technologies, Inc., et*
6 *al.*, No. 3:24-cv-05057

7 *WHB 12 v. Uber Technologies, Inc., et*
8 *al.*, No. 3:24-cv-05058

9 *WHB 1919 v. Uber Technologies, Inc., et*
10 *al.*, No. 3:24-cv-05059

11 *WHB 649 v. Uber Technologies, Inc., et*
12 *al.*, No. 3:24-cv-05095

13 *WHB 666 v. Uber Technologies, Inc., et*
14 *al.*, No. 3:24-cv-05127

15 *WHB 701 v. Uber Technologies, Inc., et*
16 *al.*, No. 3:24-cv-05138

17 *WHB 1655 v. Uber Technologies, Inc., et*
18 *al.*, No. 3:24-cv-05223

19 *WHB 451 v. Uber Technologies, Inc., et*
20 *al.*, No. 3:24-cv-05256

21 *WHB 1832 v. Uber Technologies, Inc., et*
22 *al.*, No. 3:24-cv-05305

23 *WHB 703 v. Uber Technologies, Inc., et*
24 *al.*, No. 3:24-cv-05361

25 *WHB 1272 v. Uber Technologies, Inc., et*
26 *al.*, No. 3:24-cv-05366

27 *WHB 473 v. Uber Technologies, Inc., et*
28 *al.*, No. 3:24-cv-05459

WHB 1048 v. Uber Technologies, Inc., et
al., No. 3:24-cv-05462

1 *WHB 1661 v. Uber Technologies, Inc., et*
al., No. 3:24-cv-05468

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3 *WHB 1414 v. Uber Technologies, Inc., et*
al., No. 3:24-cv-05495

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5 *WHB 1468 v. Uber Technologies, Inc., et*
al., No. 3:24-cv-05500

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7 *WHB 1043 v. Uber Technologies, Inc., et*
al., No. 3:24-cv-05501

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9 *WHB 1677 v. Uber Technologies, Inc., et*
al., No. 3:24-cv-05556

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11 *WHB 1659 v. Uber Technologies, Inc., et*
al., No. 3:24-cv-05565

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13 *WHB 981 v. Uber Technologies, Inc., et*
al., No. 3:24-cv-05573

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15 *WHB 1552 v. Uber Technologies, Inc., et*
al., No. 3:24-cv-05599

16

17 *WHB 1381 v. Uber Technologies, Inc., et*
al., No. 3:24-cv-05603

18

19 *WHB 632 v. Uber Technologies, Inc., et*
al., No. 3:24-cv-05604

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21 *WHB 1544 v. Uber Technologies, Inc., et*
al., No. 3:24-cv-05622

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23 *WHB 438 v. Uber Technologies, Inc., et*
al., No. 3:24-cv-05631

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25 *WHB 393 v. Uber Technologies, Inc., et*
al., No. 3:24-cv-05633

26

27 *WHB 349 v. Uber Technologies, Inc., et*
al., No. 3:24-cv-05636

28

29 *WHB 1611 v. Uber Technologies, Inc., et*
al., No. 3:24-cv-05665

30

31 *WHB 1416 v. Uber Technologies, Inc., et*
al., No. 3:24-cv-05667

1 *WHB 1348 v. Uber Technologies, Inc., et*
2 *al.*, No. 3:24-cv-05669

3 *WHB 946 v. Uber Technologies, Inc., et*
4 *al.*, No. 3:24-cv-05698

5 *WHB 1142 v. Uber Technologies, Inc., et*
6 *al.*, No. 3:24-cv-05712

7 *WHB 1057 v. Uber Technologies, Inc., et*
8 *al.*, No. 3:24-cv-05715

9 *WHB 1470 v. Uber Technologies, Inc., et*
10 *al.*, No. 3:24-cv-05716

11 *WHB 871 v. Uber Technologies, Inc., et*
12 *al.*, No. 3:24-cv-05770

13 *WHB 935 v. Uber Technologies, Inc., et*
14 *al.*, No. 3:24-cv-05776

15 *WHB 1484 v. Uber Technologies, Inc., et*
16 *al.*, No. 3:24-cv-05779

17 *WHB 375 v. Uber Technologies, Inc., et*
18 *al.*, No. 3:24-cv-05781

19 *WHB 1317 v. Uber Technologies, Inc., et*
20 *al.*, No. 3:24-cv-05791

21 *WHB 513 v. Uber Technologies, Inc., et*
22 *al.*, No. 3:24-cv-05951

23 *WHB 991 v. Uber Technologies, Inc., et*
24 *al.*, No. 3:24-cv-05959

25 *WHB 1556 v. Uber Technologies, Inc., et*
26 *al.*, No. 3:24-cv-05986

27 *WHB 1999 v. Uber Technologies, Inc., et*
28 *al.*, No. 3:24-cv-07048

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DECLARATION OF KYLE SMITH

I, Kyle Smith, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Arlington, Virginia. I respectfully submit this declaration in support of Defendants Uber Technologies, Inc.'s, Rasier, LLC's, and Rasier-CA, LLC's (collectively, "Uber's") portion of the joint letter brief regarding certain Williams Hart & Boundas, LLP ("Williams Hart") Plaintiffs' compliance with the Court's November 18, 2024 Plaintiff Fact Sheet ("PFS") Order.

2. I am a partner at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, representing Uber in this MDL as well as in Judicial Council Coordination Proceeding No. 5188, *In Re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the "JCCP"). I am a member in good standing of the Bar of the District of Columbia Court of Appeals and the Bar of the State of New York Court of Appeals, Third Department. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

3. Attached to this declaration as **Exhibit A** is a table identifying 63 Plaintiffs represented by Williams Hart who, as of the date of this submission, have failed to conform their PFS submissions with the Court's November 18, 2024 PFS Order. The Plaintiffs' non-compliance is identified in the table. 59 of the 63 Plaintiffs listed have not submitted a signed verification at any point. The most recent signed verification submitted by the other four Plaintiffs was submitted on November 1, 2024.

4. Attached to this declaration as **Exhibit B** is a true and correct copy of a letter Uber sent Williams Hart on December 9, 2024 identifying Plaintiffs represented by that firm who needed to amend their PFS productions to comply with the Court's November 18, 2024 PFS Order. Each of the Plaintiffs identified in Exhibit A is listed in the December 9, 2024 letter.

5. Exhibit A reflects the fact that certain Williams Hart Plaintiffs have purported to cure the deficiencies identified in Uber's December 9, 2024 letter by serving unverified fact sheets. For instance, Plaintiff WHB 1611, No. 3:24-cv-05665, MDLC ID 2176, served an unverified PFS

on October 30, 2024 that responded to Question 7, which asks Plaintiff to identify the employers for whom Plaintiff has worked, and Question 8, which asks Plaintiff to identify the highest level of education Plaintiff has obtained, with “Will Supplement.” On December 18, 2024, Plaintiff WHB 1611 served an unverified amended PFS stating that Plaintiff WHB 1611 does not remember the name of Plaintiff WHB 1611’s employer, the city or state the employer is located, Plaintiff WHB 1611’s job title, or Plaintiff WHB 1611’s responsibilities or duties notwithstanding the fact that Plaintiff WHB 1611 reports to currently be working for this employer and to have worked for this employer since August 2019. Plaintiff WHB 1611 also states that Plaintiff does not remember the highest level of education Plaintiff has obtained. Hence, while Uber’s December 9, 2024 letter identifies Plaintiff WHB 1611 as needing to, among other things, provide a verification and supplement Plaintiff WHB 1611’s responses to Questions 7 and 8, Exhibit A lists Plaintiff WHB 1611’s remaining deficiency as an unverified amended PFS. Another example is Plaintiff WHB 513, No. 3:24-cv-05951, MDLC ID 2208. Plaintiff WHB 513 served a PFS with a blank, unsigned verification on October 29, 2024 and responded to Questions 7 and 8 with “Will Supplement.” On December 30, 2024, Plaintiff served an unverified, amended PFS that changed these responses to “Unknown.”¹

6. On December 24, 2024, Uber sent Williams Hart a list of Plaintiffs who had missed their deadline to conform their PFS submissions with the Court’s November 18, 2024 PFS Order. The parties met and conferred on January 2, 2025 and on January 10, 2025 to discuss the Plaintiffs listed in Exhibit A as well as other Plaintiffs not in dispute. Following these meet and confers, the parties were unable to resolve the dispute set out in the joint letter.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 22, 2025 in New York, NY.

/s/ Kyle Smith

Kyle Smith

¹ Uber can provide Plaintiffs’ fact sheet submissions in camera or under seal at the Court’s request.

EXHIBIT A

Plaintiff	Date Complaint Was Filed	Non-Compliance with November 18, 2024 Order	Date Plaintiff Last Submitted a Signed Verification
WHB 1017, No. 3:24-cv-04806, MDLC ID 1583	8/7/2024	Unverified Amended PFS	N/A
WHB 1293, No. 3:24-cv-04817, MDLC ID 1593	8/7/2024	Unverified Amended PFS	N/A
WHB 1027, No. 3:24-cv-04820, MDLC ID 1533	8/7/2024	Unverified Second Amended PFS	N/A
WHB 928, No. 3:24-cv-04825, MDLC ID 1535	8/7/2024	Unverified Second Amended PFS	N/A
WHB 511, No. 3:24-cv-04842, MDLC ID 1551	8/7/2024	Unverified Second Amended PFS	N/A
WHB 860, No. 3:24-cv-04845, MDLC ID 1549	8/7/2024	Unverified Amended PFS	N/A
WHB 1123, No. 3:24-cv-04850, MDLC ID 1659	8/8/2024	Unverified Amended PFS	N/A
WHB 1023, No. 3:24-cv-04877, MDLC ID 1563	8/8/2024	Unverified Amended PFS	N/A

Plaintiff	Date Complaint Was Filed	Non-Compliance with November 18, 2024 Order	Date Plaintiff Last Submitted a Signed Verification
WHB 1497, No. 3:24-cv-04891, MDLC ID 1632	8/8/2024	Unverified Amended PFS	N/A
WHB 333, No. 3:24-cv-04905, MDLC ID 1595	8/8/2024	Unverified Amended PFS	N/A
WHB 1658, No. 3:24-cv-04907, MDLC ID 1597	8/8/2024	Unverified Amended PFS	N/A
WHB 203, No. 3:24-cv-04912, MDLC ID 1630	8/8/2024	Unverified Original PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answers to Questions 7 and 40.a	N/A
WHB 1873, No. 3:24-cv-04933, MDLC ID 1682	8/9/2024	Unverified Amended PFS	N/A
WHB 1619, No. 3:24-cv-04961, MDLC ID 1690	8/9/2024	Unverified Amended PFS	N/A

Plaintiff	Date Complaint Was Filed	Non-Compliance with November 18, 2024 Order	Date Plaintiff Last Submitted a Signed Verification
WHB 689, No. 3:24-cv-04965, MDLC ID 1631	8/9/2024	Unverified Amended PFS	N/A
WHB 175, No. 3:24-cv-04982, MDLC ID 1697	8/9/2024	Unverified Second Amended PFS; Required to Provide Third-Party Contact Information in Response to Questions 23.a and 30.a	N/A
WHB 1845, No. 3:24-cv-05015, MDLC ID 1725	8/10/2024	Unverified Amended PFS	N/A
WHB 676, No. 3:24-cv-05024, MDLC ID 1734	8/12/2024	Unverified Amended PFS	N/A
WHB 1900, No. 3:24-cv-05031, MDLC ID 1726	8/12/2024	Unverified Amended PFS	N/A
WHB 1941, No. 3:24-cv-05032, MDLC ID 1739	8/12/2024	Unverified Amended PFS	N/A
WHB 1431, No. 3:24-cv-05057, MDLC ID 1759	8/12/2024	Unverified Amended PFS	N/A

Plaintiff	Date Complaint Was Filed	Non-Compliance with November 18, 2024 Order	Date Plaintiff Last Submitted a Signed Verification
WHB 12, No. 3:24-cv-05058, MDLC ID 1760	8/12/2024	Unverified Second Amended PFS	N/A
WHB 1919, No. 3:24-cv-05059, MDLC ID 1761	8/12/2024	Unverified Amended PFS	N/A
WHB 649, No. 3:24-cv-05095, MDLC ID 1712	8/13/2024	Unverified Amended PFS	10/15/2024
WHB 666, No. 3:24-cv-05127, MDLC ID 1788	8/14/2024	Unverified Amended PFS	N/A
WHB 701, No. 3:24-cv-05138, MDLC ID 1869	8/14/2024	Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answer to Question 40.a	11/1/2024
WHB 1655, No. 3:24-cv-05223, MDLC ID 1903	8/16/2024	Unverified Amended PFS	10/31/2024
WHB 451, No. 3:24-cv-05256, MDLC ID 1897	8/16/2024	Unverified Original PFS; Required to Supplement Answer to Question 10.a	N/A

Plaintiff	Date Complaint Was Filed	Non-Compliance with November 18, 2024 Order	Date Plaintiff Last Submitted a Signed Verification
WHB 1832, No. 3:24-cv-05305, MDLC ID 1893	8/16/2024	Unverified Original PFS	N/A
WHB 703, No. 3:24-cv-05361, MDLC ID 1925	8/19/2024	Unverified Amended PFS	N/A
WHB 1272, No. 3:24-cv-05366, MDLC ID 1926	8/19/2024	Unverified Second Amended PFS	N/A
WHB 473, No. 3:24-cv-05459, MDLC ID 1980	8/20/2024	Unverified Amended PFS	N/A
WHB 1048, No. 3:24-cv-05462, MDLC ID 1943	8/20/2024	Unverified Amended PFS	N/A
WHB 1661, No. 3:24-cv-05468, MDLC ID 1948	8/20/2024	Unverified Amended PFS	N/A
WHB 1414, No. 3:24-cv-05495, MDLC ID 1988	8/20/2024	Unverified Original PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answer to Question 40.a	N/A

Plaintiff	Date Complaint Was Filed	Non-Compliance with November 18, 2024 Order	Date Plaintiff Last Submitted a Signed Verification
WHB 1468, No. 3:24-cv-05500, MDLC ID 1989	8/20/2024	Unverified Amended PFS	N/A
WHB 1043, No. 3:24-cv-05501, MDLC ID 1972	8/20/2024	Unverified Second Amended PFS	N/A
WHB 1677, No. 3:24-cv-05556, MDLC ID 2057	8/21/2024	Unverified Amended PFS	N/A
WHB 1659, No. 3:24-cv-05565, MDLC ID 2070	8/21/2024	Unverified Amended PFS	N/A
WHB 981, No. 3:24-cv-05573, MDLC ID 1967	8/21/2024	Unverified Original PFS	N/A
WHB 1552, No. 3:24-cv-05599, MDLC ID 2158	8/21/2024	Unverified Amended PFS	N/A
WHB 1381, No. 3:24-cv-05603, MDLC ID 2133	8/21/2024	Unverified Amended PFS	N/A
WHB 632, No. 3:24-cv-05604, MDLC ID 2134	8/21/2024	Unverified Second Amended PFS	N/A

Plaintiff	Date Complaint Was Filed	Non-Compliance with November 18, 2024 Order	Date Plaintiff Last Submitted a Signed Verification
WHB 1544, No. 3:24-cv-05622, MDLC ID 2146	8/21/2024	Unverified Original PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answer to Question 7	N/A
WHB 438, No. 3:24-cv-05631, MDLC ID 2148	8/21/2024	Unverified Amended PFS	N/A
WHB 393, No. 3:24-cv-05633, MDLC ID 2150	8/21/2024	Unverified Second Amended PFS	N/A
WHB 349, No. 3:24-cv-05636, MDLC ID 2152	8/21/2024	Unverified Amended PFS	N/A
WHB 1611, No. 3:24-cv-05665, MDLC ID 2176	8/22/2024	Unverified Amended PFS	N/A
WHB 1416, No. 3:24-cv-05667, MDLC ID 2177	8/22/2024	Unverified Amended PFS	11/1/2024
WHB 1348, No. 3:24-cv-05669, MDLC ID 2174	8/22/2024	Unverified Amended PFS	N/A

Plaintiff	Date Complaint Was Filed	Non-Compliance with November 18, 2024 Order	Date Plaintiff Last Submitted a Signed Verification
WHB 946, No. 3:24-cv-05698, MDLC ID 2184	8/22/2024	Unverified Amended PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a	N/A
WHB 1142, No. 3:24-cv-05712, MDLC ID 2187	8/22/2024	Unverified Amended PFS	N/A
WHB 1057, No. 3:24-cv-05715, MDLC ID 2189	8/22/2024	Unverified Amended PFS	N/A
WHB 1470, No. 3:24-cv-05716, MDLC ID 2190	8/22/2024	Unverified Amended PFS	N/A
WHB 871, No. 3:24-cv-05770, MDLC ID 2196	8/23/2024	Unverified Amended PFS	N/A
WHB 935, No. 3:24-cv-05776, MDLC ID 2065	8/23/2024	Unverified Amended PFS	N/A
WHB 1484, No. 3:24-cv-05779, MDLC ID 2066	8/23/2024	Unverified Amended PFS	N/A

Plaintiff	Date Complaint Was Filed	Non-Compliance with November 18, 2024 Order	Date Plaintiff Last Submitted a Signed Verification
WHB 375, No. 3:24-cv-05781, MDLC ID 2067	8/23/2024	Unverified Original PFS; Required to Supplement Answer to Question 7	N/A
WHB 1317, No. 3:24-cv-05791, MDLC ID 2199	8/23/2024	Unverified Second Amended PFS	N/A
WHB 513, No. 3:24-cv-05951, MDLC ID 2208	8/26/2024	Unverified Amended PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a	N/A
WHB 991, No. 3:24-cv-05959, MDLC ID 2206	8/26/2024	Unverified Amended PFS	N/A
WHB 1556, No. 3:24-cv-05986, MDLC ID 2180	8/26/2024	Unverified Amended PFS	N/A
WHB 1999, No. 3:24-cv-07048, MDLC ID 2629	10/8/2024	Unverified Amended PFS	N/A

EXHIBIT B

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December 9, 2024

VIA EMAIL

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Re: MDL 3084 – Plaintiffs’ Obligations Under Pretrial Order No. 10 and the Court’s
November 18, 2024 Order

Counsel,

We write to discuss Plaintiffs’ obligations under Pretrial Order No. 10 (“PTO 10”) and the Court’s November 18, 2024 Order.

I. The Court’s Orders

PTO 10 requires each Plaintiff to submit a “substantially complete” Plaintiff Fact Sheet (“PFS”). PTO 10 at 6. PTO 10 provides that in order to be “substantially complete,” the PFS must include answers to “all applicable questions” and a “signed Declaration” verifying the PFS. *Id.* Furthermore, the PFS must be accompanied by all “duly executed record release Authorizations” and the production of the “requested documents.” *Id.*

On November 18, 2024, the Court issued an order resolving the parties’ disputes regarding Plaintiffs’ obligations under PTO 10. *See generally* ECF 1877. First, the Court noted that the “parties agree that PFS responses must be verified, but dispute whether Plaintiffs must provide contemporaneous verification of any amendments to their responses.” *Id.* at 2. The Court resolved this dispute by holding that Plaintiffs must contemporaneously verify any amendments to their responses to the PFS’ questions, and that Plaintiffs “shall provide verifications for any currently unverified amendments to PFS responses no later than thirty days from the date of this Order.” *Id.* at 3.

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Regarding Plaintiffs' obligations to provide third-party contact information for certain witnesses in response to questions in the PFS, the Court held that Plaintiffs must "provide contact information for witnesses to the extent such information is known by Plaintiffs and called for by the PFS." *Id.* at 4. "For witnesses who are not represented by counsel, Plaintiffs cannot withhold that contact information by providing counsel's information instead." *Id.* at 4. If a third-party witness is represented by counsel, a Plaintiff may provide counsel's contact information only after "specifically indicat[ing]" that the third-party witness is represented. *Id.* If a Plaintiff believes there are "exceptional circumstances (other than representation by counsel) [that] warrant withholding a witness's contact information, the burden is on that plaintiff to meet and confer with Uber to seek an agreement, or to seek relief from the Court if the parties are not able to agree." *Id.* at 5 (footnote omitted). The Court ordered Plaintiffs to provide amended fact sheets with the required third-party contact information no later than thirty days from the date of the Court's order. *Id.* at 5–6.

Finally, the Court considered Plaintiffs' use of "the phrase 'will supplement' or words to that effect." *Id.* at 6. The Court held that "the questions in the PFS are not optional, and Plaintiffs may not avoid providing information that is available to them through a vague assertion that they will respond later." *Id.* (footnote omitted). Plaintiffs who do so "have violated Judge Breyer's Order requiring a party to '[a]nswer all applicable questions' (even if only to assert that the party does not know the answer), Dkt. No. 348 at 6, as well as the PFS form's requirement—approved by Judge Breyer—that '[e]ach question must be answered in full.'" *Id.* (alterations in original). The Court ordered Plaintiffs to "amend any PFS responses that currently assert only that a plaintiff will supplement the response" no later than 30 days from the date of the Court's order. *Id.* at 7.

II. Compliance with the Court's November 18 Order

The following Plaintiffs represented by your firm have failed to provide signed verifications supporting their responses to the PFS' questions:

1. WHB 1882, No. 3:24-cv-04813, MDLC ID 1531 (unverified original PFS)
2. WHB 1027, No. 3:24-cv-04820, MDLC ID 1533 (unverified amended PFS)
3. WHB 928, No. 3:24-cv-04825, MDLC ID 1535 (unverified amended PFS)
4. WHB 1682, No. 3:24-cv-04835, MDLC ID 1540 (unverified original PFS)
5. WHB 531, No. 3:24-cv-04846, MDLC ID 1543 (unverified original PFS)
6. WHB 1341, No. 3:24-cv-04839, MDLC ID 1547 (unverified amended PFS)
7. WHB 860, No. 3:24-cv-04845, MDLC ID 1549 (unverified original PFS)
8. WHB 682, No. 3:24-cv-04805, MDLC ID 1550 (unverified amended PFS)
9. WHB 511, No. 3:24-cv-04842, MDLC ID 1551 (unverified amended PFS)
10. WHB 1023, No. 3:24-cv-04877, MDLC ID 1563 (unverified amended PFS)
11. WHB 195, No. 3:24-cv-04802, MDLC ID 1582 (unverified amended PFS)
12. WHB 1017, No. 3:24-cv-04806, MDLC ID 1583 (unverified original PFS)
13. WHB 1293, No. 3:24-cv-04817, MDLC ID 1593 (unverified amended PFS)
14. WHB 600, No. 3:24-cv-04941, MDLC ID 1594 (unverified original PFS)
15. WHB 333, No. 3:24-cv-04905, MDLC ID 1595 (unverified original PFS)
16. WHB 1658, No. 3:24-cv-04907, MDLC ID 1597 (unverified original PFS)
17. WHB 56, No. 3:24-cv-04908, MDLC ID 1598 (unverified original PFS)
18. WHB 317, No. 3:24-cv-04853, MDLC ID 1604 (unverified amended PFS)

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19. WHB 1948, No. 3:24-cv-04880, MDLC ID 1606 (unverified original PFS)
20. WHB 700, No. 3:24-cv-04899, MDLC ID 1612 (unverified amended PFS)
21. WHB 526, No. 3:24-cv-04901, MDLC ID 1614 (unverified original PFS)
22. WHB 310, No. 3:24-cv-04903, MDLC ID 1616 (unverified original PFS)
23. WHB 1002, No. 3:24-cv-04885, MDLC ID 1627 (unverified original PFS)
24. WHB 203, No. 3:24-cv-04912, MDLC ID 1630 (unverified original PFS)
25. WHB 689, No. 3:24-cv-04965, MDLC ID 1631 (unverified amended PFS)
26. WHB 1497, No. 3:24-cv-04891, MDLC ID 1632 (unverified original PFS)
27. WHB 603, No. 3:24-cv-04971, MDLC ID 1633 (unverified original PFS)
28. WHB 1387, No. 3:24-cv-04958, MDLC ID 1635 (unverified original PFS)
29. WHB 1896, No. 3:24-cv-04975, MDLC ID 1638 (unverified original PFS)
30. WHB 1422, No. 3:24-cv-04925, MDLC ID 1648 (unverified amended PFS)
31. WHB 1853, No. 3:24-cv-04938, MDLC ID 1651 (unverified amended PFS)
32. WHB 1960, No. 3:24-cv-04960, MDLC ID 1655 (unverified amended PFS)
33. WHB 1123, No. 3:24-cv-04850, MDLC ID 1659 (unverified original PFS)
34. WHB 1873, No. 3:24-cv-04933, MDLC ID 1682 (unverified amended PFS)
35. WHB 1619, No. 3:24-cv-04961, MDLC ID 1690 (unverified original PFS)
36. WHB 696, No. 3:24-cv-04979, MDLC ID 1695 (unverified original PFS)
37. WHB 175, No. 3:24-cv-04982, MDLC ID 1697 (unverified amended PFS)
38. WHB 859, No. 3:24-cv-04934, MDLC ID 1701 (unverified original PFS)
39. WHB 1345, No. 3:24-cv-05008, MDLC ID 1706 (unverified original PFS)
40. WHB 1908, No. 3:24-cv-05050, MDLC ID 1708 (unverified second amended PFS)
41. WHB 530, No. 3:24-cv-05091, MDLC ID 1711 (unverified original PFS)
42. WHB 178, No. 3:24-cv-05098, MDLC ID 1713 (unverified amended PFS)
43. WHB 1489, No. 3:24-cv-05093, MDLC ID 1715 (unverified original PFS)
44. WHB 1845, No. 3:24-cv-05015, MDLC ID 1725 (unverified original PFS)
45. WHB 1900, No. 3:24-cv-05031, MDLC ID 1726 (unverified original PFS)
46. WHB 1007, No. 3:24-cv-05023, MDLC ID 1731 (unverified original PFS)
47. WHB 1269, No. 3:24-cv-05025, MDLC ID 1732 (unverified original PFS)
48. WHB 676, No. 3:24-cv-05024, MDLC ID 1734 (unverified original PFS)
49. WHB 1941, No. 3:24-cv-05032, MDLC ID 1739 (unverified original PFS)
50. WHB 1837, No. 3:24-cv-05033, MDLC ID 1747 (unverified original PFS)
51. WHB 999, No. 3:24-cv-05036, MDLC ID 1748 (unverified original PFS)
52. WHB 1606, No. 3:24-cv-05066, MDLC ID 1757 (unverified original PFS)
53. WHB 1431, No. 3:24-cv-05057, MDLC ID 1759 (unverified original PFS)
54. WHB 12, No. 3:24-cv-05058, MDLC ID 1760 (unverified original PFS)
55. WHB 1919, No. 3:24-cv-05059, MDLC ID 1761 (unverified original PFS)
56. WHB 599, No. 3:24-cv-05062, MDLC ID 1764 (unverified original PFS)
57. WHB 979, No. 3:24-cv-05082, MDLC ID 1770 (unverified original PFS)
58. WHB 666, No. 3:24-cv-05127, MDLC ID 1788 (unverified original PFS)
59. WHB 504, No. 3:24-cv-05243, MDLC ID 1838 (unverified original PFS)
60. WHB 823, No. 3:24-cv-05041, MDLC ID 1845 (unverified original PFS)
61. WHB 931, No. 3:24-cv-05130, MDLC ID 1865 (unverified original PFS)
62. WHB 427, No. 3:24-cv-05132, MDLC ID 1866 (unverified original PFS)
63. WHB 1425, No. 3:24-cv-05129, MDLC ID 1868 (unverified original PFS)
64. WHB 638, No. 3:24-cv-05116, MDLC ID 1874 (unverified original PFS)

65. WHB 1610, No. 3:24-cv-05118, MDLC ID 1875 (unverified original PFS)
66. WHB 1386, No. 3:24-cv-05128, MDLC ID 1878 (unverified original PFS)
67. WHB 510, No. 3:24-cv-05278, MDLC ID 1879 (unverified original PFS)
68. WHB 1832, No. 3:24-cv-05305, MDLC ID 1893 (unverified original PFS)
69. WHB 451, No. 3:24-cv-05256, MDLC ID 1897 (unverified original PFS)
70. WHB 70, No. 3:24-cv-05261, MDLC ID 1899 (unverified second amended PFS)
71. WHB 373, No. 3:24-cv-05224, MDLC ID 1910 (unverified original PFS)
72. WHB 428, No. 3:24-cv-05236, MDLC ID 1917 (unverified original PFS)
73. WHB 1962, No. 3:24-cv-05240, MDLC ID 1918 (unverified original PFS)
74. WHB 1024, No. 3:24-cv-05258, MDLC ID 1921 (unverified original PFS)
75. WHB 703, No. 3:24-cv-05361, MDLC ID 1925 (unverified original PFS)
76. WHB 1272, No. 3:24-cv-05366, MDLC ID 1926 (unverified original PFS)
77. WHB 873, No. 3:24-cv-05351, MDLC ID 1931 (unverified original PFS)
78. WHB 662, No. 3:24-cv-05355, MDLC ID 1940 (unverified original PFS)
79. WHB 1048, No. 3:24-cv-05462, MDLC ID 1943 (unverified original PFS)
80. WHB 1021, No. 3:24-cv-05466, MDLC ID 1947 (unverified amended PFS)
81. WHB 1661, No. 3:24-cv-05468, MDLC ID 1948 (unverified original PFS)
82. WHB 1443, No. 3:24-cv-05472, MDLC ID 1950 (unverified amended PFS)
83. WHB 58, No. 3:24-cv-05477, MDLC ID 1953 (unverified amended PFS)
84. WHB 1540, No. 3:24-cv-05449, MDLC ID 1959 (unverified amended PFS)
85. WHB 981, No. 3:24-cv-05573, MDLC ID 1967 (unverified original PFS)
86. WHB 1457, No. 3:24-cv-05576, MDLC ID 1971 (unverified amended PFS)
87. WHB 1043, No. 3:24-cv-05501, MDLC ID 1972 (unverified second amended PFS)
88. WHB 1338, No. 3:24-cv-05434, MDLC ID 1974 (unverified original PFS)
89. WHB 473, No. 3:24-cv-05459, MDLC ID 1980 (unverified original PFS)
90. WHB 406, No. 3:24-cv-05560, MDLC ID 1985 (unverified original PFS)
91. WHB 1414, No. 3:24-cv-05495, MDLC ID 1988 (unverified original PFS)
92. WHB 1468, No. 3:24-cv-05500, MDLC ID 1989 (unverified original PFS)
93. WHB 1324, No. 3:24-cv-05561, MDLC ID 2055 (unverified amended PFS)
94. WHB 1677, No. 3:24-cv-05556, MDLC ID 2057 (unverified original PFS)
95. WHB 1860, No. 3:24-cv-05568, MDLC ID 2061 (unverified original PFS)
96. WHB 935, No. 3:24-cv-05776, MDLC ID 2065 (unverified original PFS)
97. WHB 1484, No. 3:24-cv-05779, MDLC ID 2066 (unverified original PFS)
98. WHB 375, No. 3:24-cv-05781, MDLC ID 2067 (unverified original PFS)
99. WHB 1659, No. 3:24-cv-05565, MDLC ID 2070 (unverified amended PFS)
100. WHB 498, No. 3:24-cv-05769, MDLC ID 2074 (unverified original PFS)
101. WHB 678, No. 3:24-cv-05961, MDLC ID 2078 (unverified original PFS)
102. WHB 1381, No. 3:24-cv-05603, MDLC ID 2133 (unverified original PFS)
103. WHB 632, No. 3:24-cv-05604, MDLC ID 2134 (unverified amended PFS)
104. WHB 517, No. 3:24-cv-05608, MDLC ID 2135 (unverified original PFS)
105. WHB 339, No. 3:24-cv-05614, MDLC ID 2141 (unverified original PFS)
106. WHB 1544, No. 3:24-cv-05622, MDLC ID 2146 (unverified original PFS)
107. WHB 438, No. 3:24-cv-05631, MDLC ID 2148 (unverified original PFS)
108. WHB 393, No. 3:24-cv-05633, MDLC ID 2150 (unverified original PFS)
109. WHB 338, No. 3:24-cv-05635, MDLC ID 2151 (unverified original PFS)
110. WHB 349, No. 3:24-cv-05636, MDLC ID 2152 (unverified original PFS)

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111. WHB 1552, No. 3:24-cv-05599, MDLC ID 2158 (unverified original PFS)
112. WHB 465, No. 3:24-cv-05617, MDLC ID 2162 (unverified amended PFS)
113. WHB 1348, No. 3:24-cv-05669, MDLC ID 2174 (unverified original PFS)
114. WHB 1332, No. 3:24-cv-05670, MDLC ID 2175 (unverified original PFS)
115. WHB 1611, No. 3:24-cv-05665, MDLC ID 2176 (unverified original PFS)
116. WHB 891, No. 3:24-cv-05666, MDLC ID 2178 (unverified original PFS)
117. WHB 435, No. 3:24-cv-05668, MDLC ID 2179 (unverified amended PFS)
118. WHB 1556, No. 3:24-cv-05986, MDLC ID 2180 (unverified original PFS)
119. WHB 1947, No. 3:24-cv-05714, MDLC ID 2183 (unverified original PFS)
120. WHB 946, No. 3:24-cv-05698, MDLC ID 2184 (unverified original PFS)
121. WHB 505, No. 3:24-cv-05709, MDLC ID 2186 (unverified original PFS)
122. WHB 1142, No. 3:24-cv-05712, MDLC ID 2187 (unverified original PFS)
123. WHB 1057, No. 3:24-cv-05715, MDLC ID 2189 (unverified original PFS)
124. WHB 1470, No. 3:24-cv-05716, MDLC ID 2190 (unverified original PFS)
125. WHB 1843, No. 3:24-cv-05693, MDLC ID 2193 (unverified original PFS)
126. WHB 856, No. 3:24-cv-05699, MDLC ID 2194 (unverified original PFS)
127. WHB 1398, No. 3:24-cv-05705, MDLC ID 2195 (unverified original PFS)
128. WHB 871, No. 3:24-cv-05770, MDLC ID 2196 (unverified original PFS)
129. WHB 413, No. 3:24-cv-05782, MDLC ID 2198 (unverified original PFS)
130. WHB 1317, No. 3:24-cv-05791, MDLC ID 2199 (unverified original PFS)
131. WHB 1481, No. 3:24-cv-05794, MDLC ID 2201 (unverified original PFS)
132. WHB 991, No. 3:24-cv-05959, MDLC ID 2206 (unverified original PFS)
133. WHB 884, No. 3:24-cv-05948, MDLC ID 2207 (unverified original PFS)
134. WHB 513, No. 3:24-cv-05951, MDLC ID 2208 (unverified original PFS)
135. WHB 1999, No. 3:24-cv-07048, MDLC ID 2629 (unverified original PFS)
136. WHB 2000, No. 3:24-cv-07183, MDLC ID 2630 (unverified original PFS)

The following Plaintiffs represented by your firm have withheld third-party contact information requested by Questions 23.a, 26.c, 27.b, or 30.a by either providing counsel's contact information without specifically indicating the third party is represented or by failing to answer these questions in full:

1. Jane Doe F-2, No. 3:23-cv-03949, MDLC ID 1044 (Question 30.a)
2. WHB 1966, No. 3:24-cv-04546, MDLC ID 1479 (Question 30.a)
3. WHB 1841, No. 3:24-cv-04799, MDLC ID 1521 (Question 30.a)
4. WHB 1608, No. 3:24-cv-04795, MDLC ID 1522 (Questions 23.a and 30.a)
5. WHB 1444, No. 3:24-cv-04804, MDLC ID 1527 (Question 30.a)
6. WHB 1557, No. 3:24-cv-04798, MDLC ID 1528 (Question 30.a)
7. WHB 1486, No. 3:24-cv-04803, MDLC ID 1529 (Questions 23.a and 30.a)
8. WHB 1882, No. 3:24-cv-04813, MDLC ID 1531 (Question 30.a)
9. WHB 1912, No. 3:24-cv-04827, MDLC ID 1536 (Question 30.a)
10. WHB 621, No. 3:24-cv-04832, MDLC ID 1538 (Question 30.a)
11. WHB 188, No. 3:24-cv-04834, MDLC ID 1539 (Question 30.a)
12. WHB 1682, No. 3:24-cv-04835, MDLC ID 1540 (Questions 23.a and 30.a)
13. WHB 397, No. 3:24-cv-04838, MDLC ID 1541 (Question 30.a)
14. WHB 1545, No. 3:24-cv-04844, MDLC ID 1542 (Question 30.a)
15. WHB 531, No. 3:24-cv-04846, MDLC ID 1543 (Question 30.a)

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16. WHB 191, No. 3:24-cv-04847, MDLC ID 1544 (Question 30.a)
17. WHB 1478, No. 3:24-cv-04833, MDLC ID 1546 (Question 30.a)
18. WHB 1341, No. 3:24-cv-04839, MDLC ID 1547 (Question 30.a)
19. WHB 622, No. 3:24-cv-04836, MDLC ID 1552 (Question 30.a)
20. WHB 1901, No. 3:24-cv-04815, MDLC ID 1553 (Question 30.a)
21. WHB 1539, No. 3:24-cv-04864, MDLC ID 1558 (Question 30.a)
22. WHB 601, No. 3:24-cv-04882, MDLC ID 1562 (Question 30.a)
23. WHB 199, No. 3:24-cv-04870, MDLC ID 1570 (Question 30.a)
24. WHB 1030, No. 3:24-cv-04874, MDLC ID 1571 (Question 30.a)
25. WHB 196, No. 3:24-cv-04886, MDLC ID 1573 (Question 30.a)
26. WHB 1463, No. 3:24-cv-04855, MDLC ID 1576 (Question 30.a)
27. WHB 1017, No. 3:24-cv-04806, MDLC ID 1583 (Question 30.a)
28. WHB 1399, No. 3:24-cv-04811, MDLC ID 1585 (Question 30.a)
29. WHB 1835, No. 3:24-cv-04824, MDLC ID 1590 (Questions 26.c and 30.a)
30. WHB 318, No. 3:24-cv-04889, MDLC ID 1591 (Question 30.a)
31. WHB 341, No. 3:24-cv-04892, MDLC ID 1592 (Question 30.a)
32. WHB 317, No. 3:24-cv-04853, MDLC ID 1604 (Question 30.a)
33. WHB 1914, No. 3:24-cv-04869, MDLC ID 1605 (Question 30.a)
34. WHB 1948, No. 3:24-cv-04880, MDLC ID 1606 (Question 30.a)
35. WHB 1590, No. 3:24-cv-04946, MDLC ID 1607 (Question 30.a)
36. WHB 1951, No. 3:24-cv-04895, MDLC ID 1609 (Questions 23.a and 30.a)
37. WHB 832, No. 3:24-cv-04900, MDLC ID 1613 (Question 30.a)
38. WHB 526, No. 3:24-cv-04901, MDLC ID 1614 (Question 30.a)
39. WHB 310, No. 3:24-cv-04903, MDLC ID 1616 (Question 30.a)
40. WHB 854, No. 3:24-cv-04873, MDLC ID 1625 (Question 30.a)
41. WHB 1002, No. 3:24-cv-04885, MDLC ID 1627 (Question 30.a)
42. WHB 203, No. 3:24-cv-04912, MDLC ID 1630 (Question 30.a)
43. WHB 1497, No. 3:24-cv-04891, MDLC ID 1632 (Question 30.a)
44. WHB 603, No. 3:24-cv-04971, MDLC ID 1633 (Question 30.a)
45. WHB 1896, No. 3:24-cv-04975, MDLC ID 1638 (Question 30.a)
46. WHB 1903, No. 3:24-cv-04981, MDLC ID 1642 (Question 30.a)
47. WHB 1623, No. 3:24-cv-04986, MDLC ID 1646 (Question 30.a)
48. WHB 200, No. 3:24-cv-04988, MDLC ID 1647 (Question 30.a)
49. WHB 1422, No. 3:24-cv-04925, MDLC ID 1648 (Question 30.a)
50. WHB 312, No. 3:24-cv-04928, MDLC ID 1649 (Question 30.a)
51. WHB 1853, No. 3:24-cv-04938, MDLC ID 1651 (Question 30.a)
52. WHB 756, No. 3:24-cv-04942, MDLC ID 1652 (Question 30.a)
53. WHB 1936, No. 3:24-cv-04950, MDLC ID 1653 (Question 30.a)
54. WHB 1857, No. 3:24-cv-04955, MDLC ID 1654 (Question 30.a)
55. WHB 1960, No. 3:24-cv-04960, MDLC ID 1655 (Question 30.a)
56. WHB 950, No. 3:24-cv-04931, MDLC ID 1681 (Question 30.a)
57. WHB 1462, No. 3:24-cv-04935, MDLC ID 1683 (Question 30.a)
58. WHB 1531, No. 3:24-cv-04937, MDLC ID 1684 (Questions 23.a and 30.a)
59. WHB 1670, No. 3:24-cv-04949, MDLC ID 1685 (Question 30.a)
60. WHB 1946, No. 3:24-cv-04952, MDLC ID 1686 (Question 30.a)
61. WHB 1667, No. 3:24-cv-04957, MDLC ID 1688 (Question 30.a)

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62. WHB 1546, No. 3:24-cv-04969, MDLC ID 1689 (Question 30.a)
63. WHB 1619, No. 3:24-cv-04961, MDLC ID 1690 (Question 30.a)
64. WHB 1551, No. 3:24-cv-04940, MDLC ID 1691 (Questions 27.b and 30.a)
65. WHB 1847, No. 3:24-cv-04945, MDLC ID 1693 (Question 30.a)
66. WHB 974, No. 3:24-cv-04977, MDLC ID 1694 (Question 30.a)
67. WHB 696, No. 3:24-cv-04979, MDLC ID 1695 (Question 30.a)
68. WHB 175, No. 3:24-cv-04982, MDLC ID 1697 (Questions 23.a and 30.a)
69. WHB 179, No. 3:24-cv-04921, MDLC ID 1698 (Question 30.a)
70. WHB 202, No. 3:24-cv-04930, MDLC ID 1700 (Question 30.a)
71. WHB 1916, No. 3:24-cv-05003, MDLC ID 1702 (Question 30.a)
72. WHB 628, No. 3:24-cv-05006, MDLC ID 1705 (Question 30.a)
73. WHB 1345, No. 3:24-cv-05008, MDLC ID 1706 (Question 30.a)
74. WHB 1890, No. 3:24-cv-05048, MDLC ID 1707 (Question 30.a)
75. WHB 1908, No. 3:24-cv-05050, MDLC ID 1708 (Question 30.a)
76. WHB 1663, No. 3:24-cv-05092, MDLC ID 1709 (Question 30.a)
77. WHB 984, No. 3:24-cv-05086, MDLC ID 1710 (Question 30.a)
78. WHB 649, No. 3:24-cv-05095, MDLC ID 1712 (Question 30.a)
79. WHB 178, No. 3:24-cv-05098, MDLC ID 1713 (Question 30.a)
80. WHB 1447, No. 3:24-cv-05090, MDLC ID 1714 (Question 30.a)
81. WHB 1489, No. 3:24-cv-05093, MDLC ID 1715 (Question 30.a)
82. WHB 754, No. 3:24-cv-05096, MDLC ID 1716 (Question 30.a)
83. WHB 862, No. 3:24-cv-05097, MDLC ID 1717 (Question 30.a)
84. WHB 361, No. 3:24-cv-05009, MDLC ID 1718 (Question 30.a)
85. WHB 1889, No. 3:24-cv-05011, MDLC ID 1720 (Question 30.a)
86. WHB 1607, No. 3:24-cv-05014, MDLC ID 1724 (Question 30.a)
87. WHB 1845, No. 3:24-cv-05015, MDLC ID 1725 (Question 30.a)
88. WHB 400, No. 3:24-cv-05034, MDLC ID 1727 (Question 30.a)
89. WHB 1007, No. 3:24-cv-05023, MDLC ID 1731 (Question 30.a)
90. WHB 1941, No. 3:24-cv05032, MDLC ID 1739 (Question 30.a)
91. WHB 762, No. 3:24-cv-05035, MDLC ID 1740 (Question 30.a)
92. WHB 1837, No. 3:24-cv-05033, MDLC ID 1747 (Question 30.a)
93. WHB 999, No. 3:24-cv-05036, MDLC ID 1748 (Question 30.a)
94. WHB 1871, No. 3:24-cv-05052, MDLC ID 1750 (Question 30.a)
95. WHB 1606, No. 3:24-cv-05066, MDLC ID 1757 (Question 30.a)
96. WHB 1431, No. 3:24-cv-05057, MDLC ID 1759 (Question 30.a)
97. WHB 12, No. 3:24-cv-05058, MDLC ID 1760 (Question 30.a)
98. WHB 1919, No. 3:24-cv-05059, MDLC ID 1761 (Question 30.a)
99. WHB 3, No. 3:24-cv-05061, MDLC ID 1763 (Question 30.a)
100. WHB 599, No. 3:24-cv-05062, MDLC ID 1764 (Question 30.a)
101. WHB 1953, No. 3:24-cv-05085, MDLC ID 1765 (Question 30.a)
102. WHB 1865, No. 3:24-cv-05089, MDLC ID 1767 (Question 30.a)
103. WHB 1967, No. 3:24-cv-05094, MDLC ID 1768 (Question 30.a)
104. WHB 979, No. 3:24-cv-05082, MDLC ID 1770 (Question 30.a)
105. WHB 666, No. 3:24-cv-05127, MDLC ID 1788 (Question 30.a)
106. WHB 466, No. 3:24-cv-05265, MDLC ID 1807 (Questions 26.c and 30.a)
107. WHB 1394, No. 3:24-cv-05237, MDLC ID 1836 (Question 30.a)

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108. WHB 504, No. 3:24-cv-05243, MDLC ID 1838 (Question 30.a)
109. WHB 1406, No. 3:24-cv-05249, MDLC ID 1839 (Question 30.a)
110. WHB 823, No. 3:24-cv-05041, MDLC ID 1845 (Question 30.a)
111. WHB 1859, No. 3:24-cv-05126, MDLC ID 1855 (Question 30.a)
112. WHB 1915, No. 3:24-cv-05133, MDLC ID 1857 (Question 30.a)
113. WHB 1409, No. 3:24-cv-05122, MDLC ID 1863 (Question 30.a)
114. WHB 1839, No. 3:24-cv-05124, MDLC ID 1864 (Question 30.a)
115. WHB 931, No. 3:24-cv-05130, MDLC ID 1865 (Question 30.a)
116. WHB 427, No. 3:24-cv-05132, MDLC ID 1866 (Question 30.a)
117. WHB 1275, No. 3:24-cv-05136, MDLC ID 1867 (Question 30.a)
118. WHB 1425, No. 3:24-cv-05129, MDLC ID 1868 (Question 30.a)
119. WHB 701, No. 3:24-cv-05138, MDLC ID 1869 (Question 30.a)
120. WHB 1610, No. 3:24-cv-05118, MDLC ID 1875 (Question 30.a)
121. WHB 1469, No. 3:24-cv-05123, MDLC ID 1876 (Question 30.a)
122. WHB 1617, No. 3:24-cv-05125, MDLC ID 1877 (Question 30.a)
123. WHB 1386, No. 3:24-cv-05128, MDLC ID 1878 (Question 30.a)
124. WHB 510, No. 3:24-cv-05278, MDLC ID 1879 (Question 30.a)
125. WHB 491, No. 3:24-cv-05268, MDLC ID 1882 (Question 30.a)
126. WHB 605, No. 3:24-cv-05222, MDLC ID 1884 (Question 30.a)
127. WHB 1549, No. 3:24-cv-05275, MDLC ID 1885 (Question 30.a)
128. WHB 1474, No. 3:24-cv-05241, MDLC ID 1888 (Question 30.a)
129. WHB 1535, No. 3:24-cv-05294, MDLC ID 1891 (Question 30.a)
130. WHB 326, No. 3:24-cv-05297, MDLC ID 1892 (Question 30.a)
131. WHB 1832, No. 3:24-cv-05305, MDLC ID 1893 (Question 30.a)
132. WHB 680, No. 3:24-cv-05308, MDLC ID 1894 (Question 30.a)
133. WHB 1006, No. 3:24-cv-05310, MDLC ID 1895 (Question 30.a)
134. WHB 1876, No. 3:24-cv-05230, MDLC ID 1896 (Questions 23.a and 30.a)
135. WHB 1680, No. 3:24-cv-05283, MDLC ID 1901 (Question 30.a)
136. WHB 1655, No. 3:24-cv-05223, MDLC ID 1903 (Question 30.a)
137. WHB 1397, No. 3:24-cv-05269, MDLC ID 1907 (Question 30.a)
138. WHB 623, No. 3:24-cv-05274, MDLC ID 1908 (Question 30.a)
139. WHB 373, No. 3:24-cv-05224, MDLC ID 1910 (Questions 23.a, 26.c and 30.a)
140. WHB 1962, No. 3:24-cv-05240, MDLC ID 1918 (Question 30.a)
141. WHB 1555, No. 3:24-cv-05254, MDLC ID 1919 (Question 30.a)
142. WHB 703, No. 3:24-cv-05361, MDLC ID 1925 (Question 30.a)
143. WHB 645, No. 3:24-cv-05356, MDLC ID 1928 (Question 30.a)
144. WHB 383, No. 3:24-cv-05358, MDLC ID 1929 (Question 30.a)
145. WHB 1855, No. 3:24-cv-05364, MDLC ID 1932 (Questions 23.a and 30.a)
146. WHB 858, No. 3:24-cv-05368, MDLC ID 1935 (Question 30.a)
147. WHB 994, No. 3:24-cv-05452, MDLC ID 1937 (Question 30.a)
148. WHB 662, No. 3:24-cv-05355, MDLC ID 1940 (Questions 26.c and 30.a)
149. WHB 1888, No. 3:24-cv-05457, MDLC ID 1941 (Question 30.a)
150. WHB 335, No. 3:24-cv-05460, MDLC ID 1942 (Question 30.a)
151. WHB 1048, No. 3:24-cv-05462, MDLC ID 1943 (Question 30.a)
152. WHB 1021, No. 3:24-cv-05466, MDLC ID 1947 (Question 30.a)
153. WHB 492, No. 3:24-cv-05470, MDLC ID 1949 (Question 30.a)

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154. WHB 1443, No. 3:24-cv-05472, MDLC ID 1950 (Question 30.a)
155. WHB 952, No. 3:24-cv-05474, MDLC ID 1951 (Question 30.a)
156. WHB 187, No. 3:24-cv-05476, MDLC ID 1952 (Question 30.a)
157. WHB 58, No. 3:24-cv-05477, MDLC ID 1953 (Question 30.a)
158. WHB 1895, No. 3:24-cv-05437, MDLC ID 1955 (Question 30.a)
159. WHB 1879, No. 3:24-cv-05456, MDLC ID 1961 (Question 30.a)
160. WHB 1673, No. 3:24-cv-05552, MDLC ID 1962 (Question 30.a)
161. WHB 1930, No. 3:24-cv-05555, MDLC ID 1963 (Question 30.a)
162. WHB 1618, No. 3:24-cv-05572, MDLC ID 1964 (Question 30.a)
163. WHB 1856, No. 3:24-cv-05461, MDLC ID 1965 (Question 30.a)
164. WHB 1499, No. 3:24-cv-05467, MDLC ID 1966 (Question 30.a)
165. WHB 1596, No. 3:24-cv-05473, MDLC ID 1969 (Question 30.a)
166. WHB 1593, No. 3:24-cv-05504, MDLC ID 1973 (Question 30.a)
167. WHB 1338, No. 3:24-cv-05434, MDLC ID 1974 (Question 30.a)
168. WHB 704, No. 3:24-cv-05436, MDLC ID 1975 (Questions 23.a and 30.a)
169. WHB 1454, No. 3:24-cv-05438, MDLC ID 1976 (Question 30.a)
170. WHB 1476, No. 3:24-cv-05450, MDLC ID 1978 (Questions 23.a and 30.a)
171. WHB 1538, No. 3:24-cv-05465, MDLC ID 1981 (Question 30.a)
172. WHB 1934, No. 3:24-cv-05469, MDLC ID 1983 (Question 30.a)
173. WHB 1969, No. 3:24-cv-05483, MDLC ID 1984 (Question 30.a)
174. WHB 406, No. 3:24-cv-05560, MDLC ID 1985 (Question 30.a)
175. WHB 1414, No. 3:24-cv-05495, MDLC ID 1988 (Question 30.a)
176. WHB 1468, No. 3:24-cv-05500, MDLC ID 1989 (Question 30.a)
177. WHB 1044, No. 3:24-cv-05553, MDLC ID 2054 (Question 30.a)
178. WHB 1840, No. 3:24-cv-05554, MDLC ID 2056 (Question 30.a)
179. WHB 1020, No. 3:24-cv-05558, MDLC ID 2059 (Question 30.a)
180. WHB 1304, No. 3:24-cv-05566, MDLC ID 2060 (Question 30.a)
181. WHB 1860, No. 3:24-cv-05568, MDLC ID 2061 (Question 30.a)
182. WHB 1402, No. 3:24-cv-05570, MDLC ID 2063 (Question 30.a)
183. WHB 342, No. 3:24-cv-05784 MDLC ID 2069 (Question 30.a)
184. WHB 345, No. 3:24-cv-05766, MDLC ID 2071 (Question 30.a)
185. WHB 498, No. 3:24-cv-05769, MDLC ID 2074 (Question 30.a)
186. WHB 706, No. 3:24-cv-05771, MDLC ID 2075 (Question 30.a)
187. WHB 678, No. 3:24-cv-05961, MDLC ID 2078 (Questions 26.c and 30.a)
188. DMA 1, No. 3:24-cv-05968, MDLC ID 2130 (Questions 23.a and 30.a)
189. WHB 517, No. 3:24-cv-05608, MDLC ID 2135 (Question 30.a)
190. WHB 1943, No. 3:24-cv-05598, MDLC ID 2136 (Question 30.a)
191. WHB 1880, No. 3:24-cv-05602, MDLC ID 2139 (Question 30.a)
192. WHB 339, No. 3:24-cv-05614, MDLC ID 2141 (Question 30.a)
193. WHB 1544, No. 3:24-cv-05622, MDLC ID 2146 (Question 30.a)
194. WHB 438, No. 3:24-cv-05631, MDLC ID 2148 (Question 30.a)
195. WHB 393, No. 3:24-cv-05633, MDLC ID 2150 (Question 30.a)
196. WHB 338, No. 3:24-cv-05635, MDLC ID 2151 (Question 30.a)
197. WHB 349, No. 3:24-cv-05636, MDLC ID 2152 (Question 30.a)
198. WHB 359, No. 3:24-cv-05610, MDLC ID 2153 (Question 30.a)
199. WHB 1053, No. 3:24-cv-05612, MDLC ID 2154 (Question 30.a)

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200. WHB 1552, No. 3:24-cv-05599, MDLC ID 2158 (Question 30.a)
201. WHB 1660, No. 3:24-cv-05607, MDLC ID 2159 (Question 30.a)
202. WHB 1449, No. 3:24-cv-05587, MDLC ID 2160 (Questions 26.c and 30.a)
203. WHB 1334, No. 3:24-cv-05624, MDLC ID 2165 (Question 30.a)
204. WHB 1003, No. 3:24-cv-05616, MDLC ID 2173 (Question 30.a)
205. WHB 1348, No. 3:24-cv-05669, MDLC ID 2174 (Question 30.a)
206. WHB 1332, No. 3:24-cv-05670, MDLC ID 2175 (Question 30.a)
207. WHB 1611, No. 3:24-cv-05665, MDLC ID 2176 (Question 30.a)
208. WHB 1416, No. 3:24-cv-05667, MDLC ID 2177 (Question 30.a)
209. WHB 1844, No. 3:24-cv-05697, MDLC ID 2181 (Question 30.a)
210. WHB 946, No. 3:24-cv-05698, MDLC ID 2184 (Question 30.a)
211. WHB 1961, No. 3:24-cv-05711, MDLC ID 2185 (Question 30.a)
212. WHB 505, No. 3:24-cv-05709, MDLC ID 2186 (Question 30.a)
213. WHB 1295, No. 3:24-cv-05713, MDLC ID 2188 (Question 30.a)
214. WHB 647, No. 3:24-cv-05703, MDLC ID 2191 (Questions 26.c and 30.a)
215. WHB 503, No. 3:24-cv-05774, MDLC ID 2197 (Question 30.a)
216. WHB 1481, No. 3:24-cv-05794, MDLC ID 2201 (Questions 23.a and 30.a)
217. WHB 1927, No. 3:24-cv-05802, MDLC ID 2203 (Question 30.a)
218. WHB 520, No. 3:24-cv-05954, MDLC ID 2205 (Question 30.a)
219. WHB 991, No. 3:24-cv-05959, MDLC ID 2206 (Question 30.a)
220. WHB 884, No. 3:24-cv-05948, MDLC ID 2207 (Question 30.a)
221. WHB 513, No. 3:24-cv-05951, MDLC ID 2208 (Question 30.a)
222. WHB 1671, No. 3:24-cv-05953, MDLC ID 2209 (Question 30.a)
223. WHB 2000, No. 3:24-cv-07183, MDLC ID 2630 (Question 30.a)
224. WHB 1031, No. 3:24-cv-07757, MDLC ID 2655 (Question 30.a)

The following Plaintiffs represented by your firm have purported to answer a question in the PFS with “will supplement” or words to that effect:

1. WHB 1966, No. 3:24-cv-04546, MDLC ID 1479 (Question 7)
2. WHB 1027, No. 3:24-cv-04820, MDLC ID 1533 (Question 7)
3. WHB 928, No. 3:24-cv-04825, MDLC ID 1535 (Question 7)
4. WHB 188, No. 3:24-cv-04834, MDLC ID 1539 (Question 40.a)
5. WHB 397, No. 3:24-cv-04838, MDLC ID 1541 (Question 7)
6. WHB 860, No. 3:24-cv-04845, MDLC ID 1549 (Questions 7 and 8)
7. WHB 601, No. 3:24-cv-04882, MDLC ID 1562 (Question 40.a)
8. WHB 1017, No. 3:24-cv-04806, MDLC ID 1583 (Question 30.a)
9. WHB 1399, No. 3:24-cv-04811, MDLC ID 1585 (Questions 10.b and 10.c)
10. WHB 1835, No. 3:24-cv-04824, MDLC ID 1590 (Question 40.a)
11. WHB 600, No. 3:24-cv-04941, MDLC ID 1594 (Questions 7 and 40.a)
12. WHB 1658, No. 3:24-cv-04907, MDLC ID 1597 (Questions 7, 29.a and 30.a)
13. WHB 56, No. 3:24-cv-04908, MDLC ID 1598 (Questions 7, 29.a and 30.a)
14. WHB 317, No. 3:24-cv-04853, MDLC ID 1604 (Question 7)
15. WHB 526, No. 3:24-cv-04901, MDLC ID 1614 (Question 7)
16. WHB 1002, No. 3:24-cv-04885, MDLC ID 1627 (Question 40.a)
17. WHB 203, No. 3:24-cv-04912, MDLC ID 1630 (Questions 7 and 40.a)
18. WHB 1387, No. 3:24-cv-04958, MDLC ID 1635 (Questions 7 and 29.a)

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19. WHB 1422, No. 3:24-cv-04925, MDLC ID 1648 (Question 7)
20. WHB 1123, No. 3:24-cv-04850, MDLC ID 1659 (Question 7)
21. WHB 950, No. 3:24-cv-04931, MDLC ID 1681 (Question 40.a)
22. WHB 1667, No. 3:24-cv-04957, MDLC ID 1688 (Question 7)
23. WHB 1546, No. 3:24-cv-04969, MDLC ID 1689 (Question 40.a)
24. WHB 1619, No. 3:24-cv-04961, MDLC ID 1690 (Questions 7 and 40.a)
25. WHB 1847, No. 3:24-cv-04945, MDLC ID 1693 (Question 23.a)
26. WHB 696, No. 3:24-cv-04979, MDLC ID 1695 (Questions 7, 30.a, 36.a, and 40.a)
27. WHB 1834, No. 3:24-cv-04980, MDLC ID 1696 (Question 30.a)
28. WHB 628, No. 3:24-cv-05006, MDLC ID 1705 (Question 7)
29. WHB 530, No. 3:24-cv-05091, MDLC ID 1711 (Question 7)
30. WHB 1489, No. 3:24-cv-05093, MDLC ID 1715 (Questions 7 and 30.a)
31. WHB 862, No. 3:24-cv-05097, MDLC ID 1717 (Question 30.a)
32. WHB 1269, No. 3:24-cv-05025, MDLC ID 1732 (Questions 5, 7 and 8)
33. WHB 1941, No. 3:24-cv-05032, MDLC ID 1739 (Questions 7, 10.b, 10.c, 26.a, 29.a, and 40.a)
34. WHB 1606, No. 3:24-cv-05066, MDLC ID 1757 (Question 30.a)
35. WHB 1431, No. 3:24-cv-05057, MDLC ID 1759 (Questions 5, 7, 30.a, and 40.a)
36. WHB 599, No. 3:24-cv-05062, MDLC ID 1764 (Questions 7 and 30.a)
37. WHB 1953, No. 3:24-cv-05085, MDLC ID 1765 (Question 30.a)
38. WHB 979, No. 3:24-cv-05082, MDLC ID 1770 (Question 7)
39. WHB 931, No. 3:24-cv-05130, MDLC ID 1865 (Questions 7 and 30.a)
40. WHB 427, No. 3:24-cv-05132, MDLC ID 1866 (Questions 7, 30.a, and 40.a)
41. WHB 1425, No. 3:24-cv-05129, MDLC ID 1868 (Questions 7 and 30.a)
42. WHB 701, No. 3:24-cv-05138, MDLC ID 1869 (Question 40.a)
43. WHB 638, No. 3:24-cv-05116, MDLC ID 1874 (Questions 7, 8, 12.a, 26.a, 29.a, 30.a, and 40.a)
44. WHB 1617, No. 3:24-cv-05125, MDLC ID 1877 (Question 7)
45. WHB 1386, No. 3:24-cv-05128, MDLC ID 1878 (Question 7)
46. WHB 510, No. 3:24-cv-05278, MDLC ID 1879 (Question 30.a)
47. WHB 644, No. 3:24-cv-05272, MDLC ID 1883 (Question 10.b)
48. WHB 176, No. 3:24-cv-05286, MDLC ID 1886 (Question 30.a)
49. WHB 451, No. 3:24-cv-05256, MDLC ID 1897 (Question 10.a)
50. WHB 1949, No. 3:24-cv-05259, MDLC ID 1898 (Question 7)
51. WHB 428, No. 3:24-cv-05236, MDLC ID 1917 (Questions 7, 8, 26.a, 26.b, and 30.a)
52. WHB 1962, No. 3:24-cv-05240, MDLC ID 1918 (Questions 10.a and 29.a)
53. WHB 1272, No. 3:24-cv-05366, MDLC ID 1926 (Questions 7, 8, 10.a, 10.b, and 10.c)
54. WHB 873, No. 3:24-cv-05351, MDLC ID 1931 (Question 40.a)
55. WHB 335, No. 3:24-cv-05460, MDLC ID 1942 (Question 7)
56. WHB 1048, No. 3:24-cv-05462, MDLC ID 1943 (Questions 7 and 30.a)
57. WHB 1596, No. 3:24-cv-05473, MDLC ID 1969 (Question 40.a)
58. WHB 1338, No. 3:24-cv-05434, MDLC ID 1974 (Questions 5, 7, 8, 26.a, 26.b, and 30.a)
59. WHB 704, No. 3:24-cv-05436, MDLC ID 1975 (Question 40.a)
60. WHB 1454, No. 3:24-cv-05438, MDLC ID 1976 (Question 40.a)
61. WHB 473, No. 3:24-cv-05459, MDLC ID 1980 (Question 7)

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62. WHB 1414, No. 3:24-cv-05495, MDLC ID 1988 (Question 40.a)
63. WHB 1044, No. 3:24-cv-05553, MDLC ID 2054 (Questions 10.a and 40.a)
64. WHB 1860, No. 3:24-cv-05568, MDLC ID 2061 (Question 7)
65. WHB 1010, No. 3:24-cv-05773, MDLC ID 2064 (Question 7)
66. WHB 375, No. 3:24-cv-05781, MDLC ID 2067 (Question 7)
67. WHB 498, No. 3:24-cv-05769, MDLC ID 2074 (Question 7)
68. WHB 678, No. 3:24-cv-05961, MDLC ID 2078 (Question 40.a)
69. WHB 1381, No. 3:24-cv-05603, MDLC ID 2133 (Questions 7, 8, 11, 12.a, 13.a, 13.c, 14.a, 14.c, 17, 20, 23.a, 26.a, 26.b, 26.c, 30.a, 36.a, and 40.a)
70. WHB 632, No. 3:24-cv-05604, MDLC ID 2134 (Questions 7, 8, 30.a, and 40.a)
71. WHB 339, No. 3:24-cv-05614, MDLC ID 2141 (Question 7)
72. WHB 1544, No. 3:24-cv-05622, MDLC ID 2146 (Question 7)
73. WHB 438, No. 3:24-cv-05631, MDLC ID 2148 (Questions 7 and 30.a)
74. WHB 393, No. 3:24-cv-05633, MDLC ID 2150 (Questions 7, 10.b, 10.c, and 30.a)
75. WHB 338, No. 3:24-cv-05635, MDLC ID 2151 (Question 30.a)
76. WHB 349, No. 3:24-cv-05636, MDLC ID 2152 (Questions 7 and 30.a)
77. WHB 1552, No. 3:24-cv-05599, MDLC ID 2158 (Questions 7, 30.a, and 40.a)
78. WHB 1003, No. 3:24-cv-05616, MDLC ID 2173 (Question 40.a)
79. WHB 1348, No. 3:24-cv-05669, MDLC ID 2174 (Question 7)
80. WHB 1611, No. 3:24-cv-05665, MDLC ID 2176 (Questions 2, 3, 5, 7, 8, 10.a, 11, 13.a, 13.c, 14.a, 14.c, 16, 17, 36.a, and 40.a)
81. WHB 891, No. 3:24-cv-05666, MDLC ID 2178 (Questions 5, 7, 8, 26.a, 26.b, 30.a, and 40.a)
82. WHB 1556, No. 3:24-cv-05986, MDLC ID 2180 (Questions 7, 29.a, 30.a, and 40.a)
83. WHB 946, No. 3:24-cv-05698, MDLC ID 2184 (Questions 7, 26.a, 26.b, and 26.c)
84. WHB 505, No. 3:24-cv-05709, MDLC ID 2186 (Questions 7 and 30.a)
85. WHB 1142, No. 3:24-cv-05712, MDLC ID 2187 (Questions 7, 26.a and 26.b)
86. WHB 1057, No. 3:24-cv-05715, MDLC ID 2189 (Question 7)
87. WHB 1470, No. 3:24-cv-05716, MDLC ID 2190 (Questions 7 and 8)
88. WHB 871, No. 3:24-cv-05770, MDLC ID 2196 (Questions 7, 8, 26.a, 26.b, and 30.a)
89. WHB 413, No. 3:24-cv-05782, MDLC ID 2198 (Questions 2, 8, and 30.a)
90. WHB 1317, No. 3:24-cv-05791, MDLC ID 2199 (Questions 2, 7, 8, 16, and 30.a)
91. WHB 991, No. 3:24-cv-05959, MDLC ID 2206 (Questions 7 and 8)
92. WHB 884, No. 3:24-cv-05948, MDLC ID 2207 (Question 7)
93. WHB 513, No. 3:24-cv-05951, MDLC ID 2208 (Questions 7 and 8)
94. WHB 1999, No. 3:24-cv-07048, MDLC ID 2629 (Questions 7 and 29.a)
95. WHB 2000, No. 3:24-cv-07183, MDLC ID 2630 (Questions 3, 7, and 29.a)

Per the Court's November 18 order, each Plaintiff identified above must serve a verified fact sheet with responses to all questions by no later than Wednesday, December 18, 2024.

Uber reserves all rights with respect to all deficiencies in your client's PFS, including the right to move for dismissal with prejudice as to any Plaintiff who does not promptly provide sufficient disclosures in compliance with the Court's November 18 order and PTO 10.

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Sincerely,

**PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP**

By: /s/ Kyle Smith

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